### IN THE UNITED STATES DISTRICT COURT

### FOR THE EASTERN DISTRICT OF TEXAS

### **TYLER DIVISION**

STRAGENT, LLC, et al.,	§
	§
Plaintiffs,	§ CIVIL ACTION NO. 6:10-CV-225-LED-JDL
	§
v.	§
	§
AMAZON.COM, INC., et al.,	§ JURY TRIAL DEMANDED
	§
Defendants.	§

## JOINT NOTICE OF SETTLEMENT AND MOTION TO STAY ALL DEADLINES

Plaintiffs Stragent, LLC and SeeSaw Foundation and Defendant Amazon.com, Inc. jointly notify the Court that they have reached an agreement to settle the above-entitled and numbered civil action, and respectfully move for the Court to stay all deadlines in the case. The parties anticipate that they will reduce the agreement to writing and move to dismiss within 30 days.

WHEREFORE, PREMISES CONSIDERED, the parties pray that the Court stay all deadlines in this case, and for all other relief to which they are justly entitled.

Respectfully submitted,

Eric M. Albritton

Texas State Bar No. 00790215

ema@emafirm.com

Stephen E. Edwards

Texas State Bar No. 00784008

see@emafirm.com

Debra Coleman

Texas State Bar No. 24059595

drc@emafirm.com

ALBRITTON LAW FIRM

P.O. Box 2649

Longview, Texas 75606 Telephone: (903) 757-8449 Facsimile: (903) 758-7397

Danny L. Williams

Texas State Bar No. 21518050

danny@wmalaw.com

J. Mike Amerson

Texas State Bar No. 01150025

mike@wmalaw.com

Jaison C. John

Texas State Bar No. 24002351

jjohn@wmalaw.com

Christopher N. Cravey

Texas State Bar No. 24034398

ccravey@wmalaw.com

Matthew R. Rodgers

Texas State Bar No. 24041802

mrodgers@wmalaw.com

Michael A. Benefield

Texas State Bar No. 24073408

mbenefield @wmalaw.com

David Morehan

Texas State Bar No. 24065790

dmorehan@wmalaw.com

WILLIAMS, MORGAN & AMERSON, P.C.

10333 Richmond, Suite 1100

Houston, Texas 77042

Telephone: (713) 934-7000 Facsimile: (713) 934-7011

Attorneys for Plaintiffs

Stragent, LLC and SeeSaw Foundation

Respectfully submitted,

/s/ Thomas G. Pasternak (by permission)

Thomas G. Pasternak (admitted *pro hac vice*)

tpasternak@steptoe.com

Jennifer L. Travers (admitted pro hac vice)

jtravers@steptoe.com

STEPTOE & JOHNSON LLP 115 South La Salle Street, Suite 3100 Chicago, Illinois 60603 Telephone: (312) 577-1265

Facsimile: (312) 577-1370

Jeffrey S. Patterson
Texas State Bar No. 15596700
jpatterson@hdbdlaw.com
Jeffrey J. Cox
Texas State Bar No. 04947530
jcox@hdbdlaw.com
HARTLINE DACUS BARGER DREYER LLP
6688 North Central Expressway
Suite 1000
Dallas, Texas 75206

Telephone: (214) 369-2100 Facsimile: (214) 369-2118

Attorneys for Amazon.com, Inc.

# **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel, who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by email, on this the 19th day of August 2011.

Eric M. Albritton